

July 19, 2004

Alberto P. Bastida, AICP
Secretary
Zoning Commission
441 4th Street, N.W.
Suite 210S
Washington, D.C. 20001

Re: No. 02-19, Forest Hills Tree and Slope Overlay

Dear Mr. Bastida:

I have seen the July 12, 2004 Report of Andrew Altman, Director of the DC Office of Planning, submitted in connection with this proceeding. American Forests conducted an Urban Ecosystem Analysis for the Washington DC Metropolitan Area, provided the planning department with all the data from the analysis and produced a report (AmFor Report). Of these two products, by far the most valuable to individual zoning and development issues is the data from the imagery because it can be used on a site by site basis.

The report provides city decision makers with a general view of a complex urban area. The recommendations are generalized so that they are appropriate for the 640 square mile study area as a whole which includes over 100 political districts. In the recommendation section, and with every verbal presentation we make about the report, we say "that communities need to establish tree canopy goals tailored to their administrative area" We also provide the computer software and training for using the data. We recommend the city set a citywide tree canopy goal and use the data provided and CITYgreen software to determine the local tree cover target. Following this scenario, the citywide tree canopy was already about 5% too low at the time of there analysis and needs to be increased. This proposal would result in a significant reduction in the tree cover and therefore contrary to our recommendation.

I feel our general recommendations are misrepresented in two places on page 5 and 6. Our recommendation is a 5% increase in the city's tree cover while this proposal would result in a significant decline in that tree canopy

The OP Report is incorrect for at least four reasons when it states at page 5 that

AF recommends the following tree canopy coverage benchmarks as a starting point for local discussion and goal-setting":

- 40 percent tree canopy overall (for the DC metropolitan region as a whole); 50 percent for suburban residential (e.g., McLean, Virginia);
- 25 percent tree canopy for urban residential (e.g., the residential neighborhoods of the District specifically, such as Forest Hills); and
- 15 percent in the central business district."

ZONING COMMISSION
District of Columbia

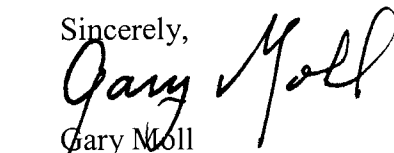
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Specifically, for the Forest Hills neighborhood, American Forests would set a tree cover target of 50% rather than the 25% proposed in this document

The OP report does not accurately represent the views of American Forests when it claims our Report recommends a 25% canopy for an area like Forest Hills.

1. AmFor does not recommend that heavily treed areas such as Forest Hills have a 25% canopy just because they are within a large city. The 25% figure in the AmFor Report is one that we use for dense residential neighborhoods, usually with town and row houses and limited tree space. Areas like Forest Hills would fit better into the suburban residential category which calls for a 50% tree cover target. We do not recommend a canopy reduction in areas like Forest Hills which provide an abundant tree cover for a city that already has a tree deficit.
2. The canopy figures offered by OP and computed by AmFor show that Forest Hills has a greater canopy than the Washington DC metropolitan area as a whole. Nevertheless, the OP Report would allow a reduction in the Forest Hills canopy. AmFor never recommends such a situation.
3. Forest Hills is a net contributor to the DC canopy. Taking from that canopy is detrimental to the canopy of the entire area.
4. The AmFor Report does not set tree coverage targets for specific areas in a vacuum. It recommends that a political or geographic area set a goal for the entire city before deciding what an appropriate goal is for an particular subsection of the city

Sincerely,


Gary Moll
Vice President
Urban Forest Center

Cc: George Clark, Forest Hills Citizens Association